

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Diverse Communications, Inc.

Application for Designation as an Eligible
Telecommunications Carrier Under 47 U.S.C.
§ 214(e)(2) of the Telecommunications Act of
1996 for its Service Area Consisting of its
Alpha Exchange.

02-0118

ILLINOIS
COMMERCE COMMISSION
MAR 1 2 53 PM '02
CHIEF CLERK'S OFFICE

VERIFIED STATEMENT OF ALCINDA JACKSON

My name is Alcinda Jackson and I am employed by the Illinois Commerce Commission as a Consumer Policy Analyst in the Consumer Services Division. My duties include Staff Liaison for the Universal Telephone Service Assistance Program and to represent consumer issue in docketed cases before the Illinois Commerce Commission.

I have reviewed the Verified Application for Designation as an Eligible Telecommunications Carrier ("ETC") filed by Diverse Communications, Inc. ("the Company").

The purpose of my verified statement is to examine the Company's application with regard to the following Federal Communication Commission ("FCC") requirements:

(A) advertising the availability of services and the charges using media of general distribution

- (B) offering Lifeline and Link Up support to qualifying low-income consumers;
- (C) prohibiting the disconnection of low-income consumers for non-payment of toll charges; and
- (D) prohibiting the collection of a deposit from low-income consumers who subscribe to toll limitation service.

A. Advertising

Pursuant to FCC Universal Service Rule ("FCC Rule") 54.201(2), an ETC must advertise the availability of services and the charges using media of general distribution. Staff conducted several workshops where Universal Service issues were discussed, including advertising guidelines, which resulted in permanent rules being adopted by the Commission. The advertising guidelines include:

1. On an ongoing basis, at least once each quarter, each ETC will advertise its programs associated with universal service. These advertisements may appear in press releases, brochures, bill inserts, LEC publications, newspapers, radio, television and/or any other suitable means in the carrier's service territory.
2. Each ETC's directory shall include an explanation of its universal service programs.
3. Each ETC will provide written notification of the low-income programs to the Director of all municipal, state or federal governmental agencies within their service area, whose clientele are likely to benefit from any of these programs. Such notification shall be provided within 30 days of the inception of a program

or a change in benefits under a program. Information to be provided shall include, at a minimum, the programs offered, descriptions of the intended recipients of the programs, the terms under which these programs are available, and directions on how and where to apply them.

4. Carriers may at any time be required to provide proof of their advertising practices to the Commission.

In its application and verified statement, the Company has committed to comply with the rules and requirements for advertising the availability of services and the charges designated for support in the Alpha Exchange.

B. Lifeline and Link Up Programs

Sections 54.400 - 54.409 and Sections 54.411-417 of the FCC Rules define the parameters of the Lifeline Program. An ETC must make the Lifeline and Link Up Programs available to qualified low-income consumers. The federal baseline Lifeline support amount shall equal \$3.50 per qualifying low-income consumers. If the state commission approves an additional reduction of \$1.75 in the amount paid by consumers, additional federal Lifeline support in the amount of \$1.75 will be made available to the carrier providing Lifeline service to that consumer. Additional federal Lifeline support will be made available in an amount equal to one-half the amount of any state Lifeline support providing Lifeline service to a qualifying low-income consumer, if the state commission approves an additional reduction in the amount paid

by the consumer equal to the state support, not to exceed \$7.00 per qualifying low-income consumers.

The Link Up Program will reduce the recipient's installation charge by 50% (up to \$30), with a deferred payment schedule for the remainder of the charges for which the consumer does not pay interest. Interest charges shall be assessed to the consumer for connection charges up to \$200.00, and may be deferred for a period not to exceed one year. ETCs will be reimbursed for both programs by an FCC designated Administrator. Lifeline and Link Up recipients must participate in one of the following programs: Medicaid, food stamps, Supplemental Security Income (SSI), federal public housing assistance, or low Income Home Energy Assistance (LIHEAP).

1. Disconnection for Nonpayment of Toll

Section 54.401(b) of the FCC's rules prohibits ETCs from disconnecting Lifeline service for non-payment of toll charges.

In its application and verified statement, the Company has stated its intent to not disconnect Lifeline service for non-payment of toll charges in the Alpha Exchange.

2. Deposits

Section 54.401(c) of the FCC's Rules prohibits an ETC from collecting a service deposit in order to initiate Lifeline service, if the qualifying low-income consumer voluntarily elects toll blocking and/or toll control from the carrier, where available. If toll blocking is unavailable, the FCC allows such carrier to charge a service deposit. Toll


blocking is defined as a service provided by carriers that lets consumers elect to not allow the completion of outgoing toll calls from their telecommunications channel.

In its application and verified statement, the Company has committed to not require a service deposit in order to initiate Lifeline service if the low-income consumer voluntarily elects toll blocking in the Alpha Exchange. The Company does not presently provide toll control.

3. Recommendation

In its application and verified statement in this proceeding, the Company has committed to comply with the Commission's rules related to Universal Service advertising, support, and operational standards for low-income consumers. For the areas of ETC eligibility that I am responsible for reviewing, I recommend that the Commission grant the Company's ETC application.

The foregoing is true to the best of my knowledge, information, and belief.


Alcinda Jackson

Subscribed and sworn to before me this
1st day of March, 2002.


Notary Public

